

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHARLES E. ANDERSON, Trustee, on behalf of)
PAINTERS' DISTRICT COUNCIL NO. 30)
HEALTH AND WELFARE FUND, PAINTERS')
DISTRICT COUNCIL NO. 30 PENSION FUND,)
and NORTHERN ILLINOIS PAINTERS,)
DECORATORS AND DRYWALL FINISHERS)
JOINT APPRENTICESHIP AND TRAINING)
FUND; DONALD STEADMAN, Trustee, on behalf)
of the NORTHERN ILLINOIS PAINTING AND)
DRYWALL INSTITUTE; and the DISTRICT)
COUNCIL NO. 30 OF THE INTERNATIONAL)
UNION OF PAINTERS AND ALLIED TRADES,)
AFL-CIO, a labor organization,)

Plaintiffs,

v.

PERNA PAINTING & DECORATING, INC. an)
Illinois corporation, and JOHN PERNA in his)
individual capacity, and MARIA PERNA in her)
individual capacity)

Defendants.

Case No. 08 CV 4253

Judge Moran

NOTICE OF MOTION

TO: See attached Certificate of Service.

PLEASE TAKE NOTICE that on Wednesday, September 10, 2008, at 9:00 a.m., I shall appear before the Honorable James B. Moran in the courtroom usually occupied by him at the Dirksen Federal Building, 219 South Dearborn Street, Chicago, Illinois, and then and there present **Plaintiffs' Motion for Default and Default Judgment**, a copy of which is attached hereto.

Respectfully submitted,

/s/ M. Garrett Hohimer

M. Garrett Hohimer

One of Plaintiffs' Attorneys

Marisel Hernandez
M. Garrett Hohimer
Jacobs, Burns, Orlove, Stanton and Hernandez
122 S. Michigan Avenue, Suite 1720
Chicago, IL 60603 (312) 372-1646

CERTIFICATE OF SERVICE

I certify that on September 3, 2008, I electronically filed the foregoing NOTICE OF MOTION FOR DEFAULT AND DEFAULT JUDGMENT with the Clerk of the court using the CM/ECF system; however, there are no attorneys of record who will be sent electronic notification of such filing.

I certify that on September 3, 2008, I caused a copy of the attached NOTICE OF MOTION FOR DEFAULT AND DEFAULT JUDGMENT to be sent via certified, restricted delivery U.S. Mail with Return Receipt to the following:

Perna Painting & Decorating, Inc.,
John Perna,
Maria Perna,
253 W Denver
Des Plaines, IL 60018

/s/ M. Garrett Hohimer